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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

IN RE: HIGH-TECH EMPLOYEE  
ANTITRUST LITIGATION

THIS DOCUMENT RELATES TO:

All Actions

Master Docket No. 11-CV-2509-LHK

**DECLARATION OF ANNE B. SHAVER IN  
SUPPORT OF PLAINTIFFS'  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PLAINTIFFS'  
CONSOLIDATED REPLY IN SUPPORT  
OF MOTION FOR CLASS  
CERTIFICATION AND IN OPPOSITION  
TO DEFENDANTS' MOTION TO STRIKE  
THE REPORT OF DR. EDWARD E.  
LEAMER**

Date: January 17, 2013  
Time: 1:30 p.m.  
Courtroom: 8, 4th Floor  
Judge: Honorable Lucy H. Koh

I, Anne B. Shaver, declare:

1           1.       I am an associate in the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP, a  
 2 member of the State Bar of California, and am admitted to practice before the United States  
 3 District Court for the Northern District of California. I am one of the counsel for the Plaintiffs in  
 4 this action. Unless otherwise indicated, I make this declaration based on my own personal  
 5 knowledge. If called upon to testify, I could and would testify competently to the truth of the  
 6 matters stated herein.

7           2.       Plaintiffs seek permission to file under seal portions of:

8               (a)     Plaintiffs' Consolidated Reply in support of Motion for Class Certification  
 9 and in Opposition to Defendants' Motion to Strike the Report of Dr. Edward E. Leamer; and

10              (b)     Reply Expert Report of Edward E. Leamer, Ph.D.

11              (c)     Exhibits 9 and 10 to the Declaration of Dean M. Harvey in Support of  
 12 Plaintiffs' Consolidated Reply in support of Motion for Class Certification and Opposition to  
 13 Defendants' Motion to Strike the Report of Dr. Edward E. Leamer.

14           3.       Designated portions of the documents referenced in paragraph 2 refer to  
 15 documents or information that Defendants or Plaintiffs have designated "CONFIDENTIAL" or  
 16 "CONFIDENTIAL – ATTORNEYS' EYES ONLY" under the Stipulated Protective Order  
 17 (Modified by the Court) (Dkt. No. 107).

18           4.       Plaintiffs further seek permission to file under seal the following documents in  
 19 their entirety:

20              (a)     Exhibits 1-6 and 12-30 to the Declaration of Dean M. Harvey in Support of  
 21 Plaintiffs' Consolidated Reply in support of Motion for Class Certification and Opposition to  
 22 Defendants' Motion to Strike the Report of Dr. Edward E. Leamer.

23           5.       The documents referenced in paragraph 4 have been designated  
 24 "CONFIDENTIAL" or "CONFIDENTIAL – ATTORNEYS' EYES ONLY" by Defendants or  
 25 Plaintiffs under the Stipulated Protective Order (Modified by the Court) (Dkt. No. 107).

26           6.       Defendants have confirmed that all documents produced by Defendants in this  
 27 litigation that are designated "CONFIDENTIAL" or "CONFIDENTIAL-ATTORNEYS' EYES  
 28 ONLY" should be filed under seal.

